Intellectual Ventures v. Citigroup, Inc. et al. - Case No. 14-cv-04638 (AKH)

Combined Chart of Proposed Terms and Constructions

U.S. Patent No. 6,819,271 (Asserted Claims: 1-6; 8; 10-17; 34; 54; 65-70; 72; 107-110):

TERM	IV'S CONSTRUCTION	CITI'S CONSTRUCTION	COURT'S CONSTRUCTION
"parallel data compression algorithm" (claims 1, 10, 32 [asserted claim 34 depends from claim 32], 52 [asserted claim 54 depends from claim 52])	"an algorithm in a parallel compression engine that compresses more than one data unit at a time"	"an algorithm that compresses data across multiple processing units at the same time"	
"parallel data decompression algorithm" (claims 11, 65, 107, 109)	"an algorithm in a parallel decompression engine that decompresses one or more data units at a time"	"an algorithm that decompresses data across multiple processing units at the same time except in a last decompression cycle"	

U.S. Patent No. 7,984,081 (Asserted Claims: 1-4; 10-13; 21-24):

TERM	IV'S CONSTRUCTION	CITI'S CONSTRUCTION	COURT'S CONSTRUCTION
Preambles of claims 1 and 21	The preambles are limiting	The preambles are not limiting	
"primary record type" (claims 1, 2, 10, 11, 19, 21, 22)	"a data type that defines a data structure to contain data extracted from XML documents"	"a data type that defines a data structure"	
"management record type" (claims 1, 2, 3, 10, 11, 12, 21, 22, 23)	"a data type that defines a collection of primary record types"	"a data type that defines a user-defined collection of primary record types"	

TERM	IV'S CONSTRUCTION	CITI'S CONSTRUCTION	COURT'S CONSTRUCTION
"organiz[es]/[ing] instances of the plurality of primary record types into a hierarchy to form a management record type" (claims 1, 10, 21)	Plain and ordinary meaning	Indefinite	

U.S. Patent No. 7,634,666 (Asserted Claim: 4):

TERM	IV'S CONSTRUCTION	CITI'S CONSTRUCTION	COURT'S CONSTRUCTION
"multiplication unit" (claim 4)	"a unit that performs multiplication"	"a unit that solely performs multiplication"	
"addition unit" (claim 4)	"a unit that performs addition"	"a unit that solely performs addition"	
"sign inversion unit" (claim 4)	"a unit that changes positive numbers to negative numbers and changes negative numbers to positive numbers"	"a unit that solely changes positive numbers to negative numbers and negative numbers to positive numbers"	
"host processor" (claim 4)	"a central processing unit that runs the computer system"	"the processor that drives the cryptographic coprocessor"	
"op-code signal" (claim 4)	"signal capable of indicating an RSA operation when it has one characteristic and an ECC operation when it has a different characteristic. RSA and ECC are two protocols for encryption"	"signal capable of indicating an RSA operation when it has one characteristic and an ECC operation when it has a different characteristic. RSA and ECC are two protocols for encryption"	[AGREED]
"high frequency manipulated data" (claim 4)	"data operated on at a higher rate"	"data operated on at a higher clock speed"	

"lower frequency manipulated data" (claim 4)	"data operated on at a lower rate"	"data operated on at a lower clock speed"	

U.S. Patent No. 6,546,002 (Asserted Claims: 1; 4; 6-9; 11; 14; 16-19; 21-23; 34; 36-37; 39):

TERM	IV'S CONSTRUCTION	CITI'S CONSTRUCTION	COURT'S CONSTRUCTION
"mobile interface" (claims 1, 7-9, 11, 34, 36, 37, 39)	"a user interface accessible on different computing devices and capable of dynamically accessing user specific data stored on a network server and local device"	Indefinite In the alternative, the term should be given its plain meaning (i.e., "an interface operable to move from one local device to another")	
"retrieving" / "retrieved" (claims 1, 7-9, 11, 17-19, 34, 39)	"accessing / accessed for use by the local device"	"requesting / requested and obtaining / obtained for use by the local device"	
"user specific resources and information" (claims 1, 4, 11, 14, 34, 36, 37)	"resources and information associated with a particular user"	"resources and information associated with a particular user"	[AGREED]
"pointer" (claims 1, 11, 34, 36-37)	"a link/shortcut to a user-specific item accessible on a computer, PDA or server"	"a link/shortcut to a user-specific item accessible on a computer, PDA or server"	[AGREED]

U.S. Patent No. 5,745,574 (Asserted Claims: 18-31)[1]:

TERM	IV'S CONSTRUCTION	CITI'S CONSTRUCTION	COURT'S CONSTRUCTION
"certification Infrastructure" (claims 18, 21, 23, 28, 30-31)	"a set of processes and associated devices by which certification is achieved"	"a set of processes and associated devices by which certification is achieved"	[AGREED]
"public key" (claims 18, 22-28)	"a key that can be used to encrypt data, and to decrypt	"a key that can be used to encrypt data, and to decrypt	[AGREED]

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[1] The parties agree that the preambles are limiting.

TERM	IV'S CONSTRUCTION	CITI'S CONSTRUCTION	COURT'S CONSTRUCTION
	data that has been encrypted by a corresponding private key"	data that has been encrypted by a corresponding private key"	
"[public key] certificate" (claims 18-31)	"a certificate that vouches for the trustworthiness of a public key including by indicating that the public key was issued by the issuer who was supposed to have issued it"	"specially constructed data structure which is signed by a certification authority and contains a user's public key, the user's identity, and some additional parameters related to the validity of the certificate"	
"certification authority" (claims 18, 21, 25)	"an authority established by the processing system to approve who may use the system according to policies or protocols duly established for that authority"	"an authority established by the processing system to approve who may use the system according to policies or protocols duly established for that authority"	[**AGREED**]
"revoking the current certificate" (claim 30)	"designating the current certificate as revoked in a data structure that can respond to a query by indicating the certificate's revocation status"	"designating the current certificate as revoked in a data structure that can respond to a query by indicating the certificate's revocation status"	[**AGREED**]
"policy certification authority" (claim 21)[2]	"authority that defines a particular set of certification policies"	"certification authority that defines a particular set of certification policies"	
"revocation list" (claims 24, 28-29)[3]	"a list identifying revoked certificates"	"a data structure identifying revoked certificates"	

[2] Intellectual Ventures believes the Court's earlier construction is the proper construction, but it will not oppose Citi's proposed construction.
[3] Intellectual Ventures believes the Court's earlier construction is the proper construction, but it will not oppose Citi's proposed construction.

TERM	IV'S CONSTRUCTION	CITI'S CONSTRUCTION	COURT'S CONSTRUCTION
"certifying and returning the data structure" (claim 18)	"signing the certificate and returning it to the requester"	"vouching for the identity of the public key owner by signing the data structure and returning it to the owner/requestor"	
"common point of trust"[4] (claims 23-24, 26)	"a point that is trusted by both the sender and the receiver"	"the lowest point in the hierarchy that is trusted by both the sender and the receiver"	
"point of trust in common with" (claim 28)	"point of trust also trusted by"	"the lowest point in the hierarchy that is trusted by"	
"application" (claim 21)	"computer program"	"computer program"	[AGREED]
"validated" / "validating" / "validation" / "verified" / "verifying" / "verification" (claims 18, 23-30)	Plain and ordinary meaning or "verified" / "verifying" / "verification"	Indefinite	
"verifying the authenticity of said request" (claim 18)	"verifying that the request is from the requestor"	"verifying that the request is from the requestor"	[AGREED]
"subordinate computer process" (claim 30)	"a computer process at a lower level of a given branch of the certification hierarchy"	"a computer process at a lower level of a given branch of the certification hierarchy"	[AGREED]
"data items required for a public key certificate" (claim 18)	"a public key and the requestor's identity"	No construction required (see construction for "[public key] certificate")	
"performed upon expiration of an existing certificate" (claim 22)	"performed after the certificate's expiration date"	"performed after the certificate's expiration date"	[AGREED]

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[4] Intellectual Ventures believes the Court's earlier construction is the proper construction, but it will not oppose Citi's proposed construction.

TERM	IV'S CONSTRUCTION	CITI'S CONSTRUCTION	COURT'S CONSTRUCTION
"verifying the authenticity of signatures iteratively, beginning with the common point of trust" (claim 23)	"decrypting the signature on the public key certificate of the computer process directly below the common point of trust using the public key of the common point of trust, then repeating the verification process for the next public key certificate in the chain between the common point of trust and the sender, using the public key of the most recently verified computer process, until the sender is verified"	"decrypting the signature on the public key certificate of the computer process directly below the common point of trust using the public key of the common point of trust, then repeating the verification process for the next public key certificate in the chain between the common point of trust and the sender, using the public key of the most recently verified computer process, until the sender is verified"	[AGREED]
"may also be verified by a direct inquiry to the certification authority which issued that certificate" (claim 25)	"may also be verified by a request to the issuing certification authority that is not acted upon by any other process in the certification infrastructure"	"may also be verified by a request to the issuing certification authority that is not acted upon by any other process in the certification infrastructure"	[AGREED]
"issuing new certificates to all subordinate computer processes for which certificates had been previously signed by the first computer process and copying to all subordinate computer processes the new certificate to be used for verification of new subordinate certificates" (claim 30)	"signing new certificates for all subordinate computer processes for which certificates had been previously signed by the first computer process, and distributing those new certificates to those subordinate processes for them to use to verify new subordinate certificates"	"signing new certificates for all subordinate computer processes for which certificates had been previously signed by the first computer process, and distributing those new certificates to those subordinate processes for them to use to verify new subordinate certificates"	[AGREED]

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TERM	IV'S CONSTRUCTION	CITI'S CONSTRUCTION	COURT'S CONSTRUCTION
"iteratively performing the distribution of the new certificate to all subsequent subordinate computer processes" (claim 30)	"each new certificate recipient distributing the new certificate to its direct subordinate entities"	"each new certificate recipient distributing the new certificate to its direct subordinate entities"	[AGREED]

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